

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA ex rel., §  
TIFFANY MONTCRIEFF, et al., §  
§  
**Relators, Plaintiff,** §  
§  
v. § **Civil Action No. 5:17-CV-00317-XR**  
§  
PERIPHERAL VASCULAR §  
ASSOCIATES, P.A., §  
§  
**Defendant.** §

**DEFENDANT'S FINAL WITNESS LIST**

Defendant Peripheral Vascular Associates, P.A. (“PVA”) discloses the following witnesses who it expects to be called to testify at the trial of this matter:

1. Alicia Burnett
2. Roberta Martinez
3. Tiffany Montcrieff
4. Demetrios Macris, MD
5. Lois Fiala, MD
6. Daniel Tamez, MD
7. Melissa Scott
8. Paul Collier, MD
9. Kathy Britt

PVA also discloses the following witnesses who it may call to testify at the trial of this matter as the need arises:

1. James Alexander, MD
2. Robert Church

3. Brian Puente
4. Mark Wengrovitz, MD
5. Patrick Hartsell, MD
6. Alfred Laborde, MD
7. Daniel Tamez, MD
8. William Kirk, MD
9. William English, MD
10. Gerardo Ortega, MD
11. Seth Fritchier, MD
12. Michael Peck, MD
13. Syed Rizvi, MD
14. Gabriel Bietz, MD
15. Boulos Toursarkissian, MD
16. Jesus Matos, MD
17. Jeffrey Stein, MD
18. Milad Mohammadi, MD
19. Thomas Beadle, MD
20. Jeffrey Martinez, MD
21. Lyssa Ochoa, MD
22. Edward Wolf, MD
23. Sean O'Connell
24. Tomas Gonzalez
25. Any witnesses identified by Relators.
26. Any witnesses necessary for rebuttal or impeachment.

If other witnesses to be called at the trial become known, their names, addresses, and subject of their testimony will be reported to opposing counsel in writing as soon as they are known; this does not apply to rebuttal or impeachment witnesses.

Respectfully submitted,

By: /s/ Sean McKenna

Sean McKenna  
State Bar No. 24007652  
smckenna@spencerfane.com  
Mark A. Cole  
*Admitted Pro Hac Vice*  
mcole@spencerfane.com  
SPENCER FANE LLP  
2200 Ross Avenue, Suite 4800 West  
Dallas, Texas 75201  
Telephone: 214-459-5890  
Facsimile: 214-750-3612

Stephen J. Romero  
State Bar No. 24046756  
stephen.romero@nortonrosefulbright.com  
Jeff Wurzburg  
State Bar No. 24105140  
jeff.wurzburg@nortonrosefulbright.com  
NORTON ROSE FULBRIGHT US LLP  
Frost Tower 111 W. Houston Street, Suite 1800 San  
Antonio, Texas 78205  
Telephone: 210-224-5575  
Facsimile: 210-270-7205

Counsel for Peripheral Vascular Associates, P.A.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of June, 2021, I caused this pleading to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel of record:

Justin T. Berger  
Sarvenaz J. Fahimi  
Cotchett Pitre & McCarthy, LLP  
840 Malcolm Road  
Burlingame, California 94010

Wallace M. Brylak, Jr.  
Brylak & Associates  
15900 La Cantera Parkway, Suite 19245  
San Antonio, Texas 78256

AUSA John M. Deck  
United States Attorney's Office for the Western District of Texas  
601 N.W. Loop 410, Suite 600  
San Antonio, Texas 78216

*/s/ Sean McKenna*

Sean McKenna